

110 Union Street, Suite 500, Seattle, Washington 98101-2038

206-343-8800 / 1-800-552-3565 / Fax 206-343-7442

Registration No. 11339
 crt. Mail No. P311603100

APR 11 1997
 No. 36217

NOTICE OF VIOLATION RCW-SEATTLE

Date of Violation: February 19, 1997 at _____m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Henrik Voldbaek Manager</u>	
Location of Violation (Address) <u>3801 E. Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>As Above</u>	City, State <u>Seattle, WA.</u>	Zip <u>98134</u>	Phone <u>623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☒ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 6B
- ☒ Section Except during kiln start up and shut down and scheduled maintenance
NOx levels not to exceed 700 ppm corrected to 10% O2 1 hr. Ave.
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION February CEM Report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: [Signature]
 Air Pollution Inspector
 Form No. 70-119 (Revised 12/95 cbc)

4/9/97
 Date/Time [Signature]

Received By: _____
 Signing this Notice is not an admission of guilt
 AGCS2M000454

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

April 21, 1997

Neal J. Shulman
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle WA 98101-2038

Dear Mr. Shulman:

Re: Notice of Violation 36217

On February 19, 1997 the kiln operations became slightly unstable. The previous day, it had been decided to lower the percent of fuel fired in the main kiln burner and increase slightly the percentage of fuel for the secondary firing at the back end of the kiln. At the beginning of the shift on the 19th, the operator determined that the fuel change was causing the instability. At 9:30 a.m. he began to switch the additional fuel from the secondary firing back to the main burner. At this time, the NO_x began to rise steadily. The operator reacted quickly to reduce the NO_x . Starting at 10:00 he began to increase the production rate on the kiln. This is the correct reaction for high NO_x . Increasing the feed rate cools the kiln, lowering the NO_x . It should be noted that there is always a tremendous amount of thermal inertia in the kiln system. It usually takes several hours to cool and stabilize the thermal conditions of the kiln.

After a thorough review of all the operating data, it is unclear to us as to why the kiln became so hot in the first place. A discussion was initiated with the operator on the possible causes and his reaction. It was stressed that great care needs to be taken any time fuel changes are made to the kiln either to the percentages of primary and secondary firing or to the type of fuel used.

Sincerely,

J. Trygve Grey
Process Engineer

Registration No. 11339
Art. Mail No. 2334353506

No. **36226**

NOTICE OF VIOLATION

Date of Violation: March 11, 19 97 at _____ m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Henrik Voldback Manager</u>	
Location of Violation (Address) <u>3801 E. Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>as above</u>	City, State <u>Seattle WA.</u>	Zip <u>98134</u>	Phone <u>(206) 623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☒ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 5730 Condition No. 7
- ☐ Section During start up of the kiln NOX emissions from the main kiln stack are not to exceed 1000 ppm corrected to 10% O₂ ± hr. Ave.
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION March '97 CEM report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: [Signature]
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbe)

6/5/97
Date/Time

Received By: _____
Signing this Notice is not an admission of guilt

AGCS2M000456

110 Union Street, Suite 500, Seattle, Washington 98101-2038

206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

ert. Mail No. 2334353 506

No. **36227**

NOTICE OF VIOLATION

Date of Violation: March 12, 1997 at _____m.

Name Ash Grove Cement Co.		Responsible Person, Title Henrik Voldback Manager	
Location of Violation (Address) 3801 E. Marginal Way So.	City Seattle	Zip 98134	County King
Mailing Address AS Above	City, State Seattle, WA.	Zip 98134	Phone (206) 623-5596

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

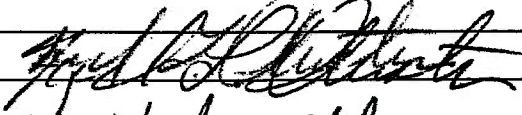
REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☒ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 5730, Condition No. 6(B)
- ☐ Section During start up of the kiln NOX emissions from the main
Stack are not to exceed 501 ppm 24 hr. Ave. corrected to 10% O₂
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION March '97 CEM report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: 

Air Pollution Inspector

Form No. 70-119 (Revised 12/95 cbc)

Date/Time 6/5/97

Received By: _____

Signing this Notice is not an admission of guilt

AGCS2M000457

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339
Rt. Mail No. P 588 633576

No. **36913**

NOTICE OF VIOLATION

Date of Violation: May 4, 19 96 at _____ m.

Name Ash Grove Cement Co.		Responsible Person, Title Henrik Voldback Manager	
Location of Violation (Address) 3801 E. Marginal Way So.	City Seattle	Zip 98134	County King
Mailing Address as above	City, State Seattle, WA.	Zip 98134	Phone (206) 623-5596

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 6(B)
- ☐ Section Emissions from the main Baghouse stack not to exceed 700 ppm NOx
7 Hr. Ave
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION MAY 1996 CEM REPORT

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

[Signature]

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

Art. Mail No. 2334353605

No. **37060**

NOTICE OF VIOLATION

Date of Violation: May 22, 19 at m.

Name Ash Grove Cement Co.		Responsible Person, Title Henrik Voldback Manager	
Location of Violation (Address) 3801 E Marginal Way So.	City Seattle	Zip 98134	County King
Mailing Address As Above	City, State Seattle, WA.	Zip 98134	Phone 623-5596

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☒ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 7
- ☐ Section During start up of the kiln main stack emissions shall not exceed 1000 ppm NOx corrected to 10% O₂ for a 1 hr. Arc
- ☐ Section

FACTS ALLEGED TO CONSTITUTE A VIOLATION May CEM Report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: [Signature]
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

8/5/97
Date/Time

Received By:
Signing this Notice is not an admission of guilt

AGCS2M000459

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

August 25, 1997

Elizabeth Gilpin
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle WA 98101-2038

Dear Ms. Gilpin:

Re: Notice of Violation 37060

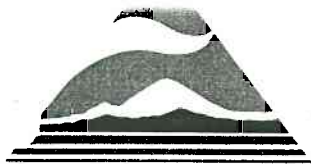
The following is in response to your letter dated September 10, 1996 and received September 13, 1996.

NOV # 37060:

The hourly average for NOX emissions was over the permitted limit for two hours on 5/22/97. The averages were 1061 and 1027 for the hours between 19:00 and 21:00. The kiln had been started at 19:15 after a power outage. At this time we were using tires as the primary fuel in the calciner. One of the main motors on the tire feeding system failed. We were unexpectedly forced to switch fuels on the calciner to coal. At this time, we were taking action to rectify the problem. Steps were being taken both on the operations side, and maintenance. The operator was steadily increasing production which has the effect of reducing the NOX concentration levels of the exit gas. Maintenance personnel replaced the motor for the tire feeder. This was in place and restarted by 21:15. By 22:00 the NOX were down to 700 ppmc and by 23:00, the kiln was running stably with the NOX around 400 ppmc. These two hours of excess NOX emissions should be considered unavoidable under WAC 173-400-107 (6). The event was caused by a mechanical failure of the tire feeder. This was not due to poor operation, maintenance or design. The event is not recurring as this is the first such failure in over a year which the system has been in operation. The operator and maintenance staff took immediate and appropriate action as described above to rectify the situation.

Sincerely,

J. Trygve Grey
Process Engineer



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

November 17, 1998

Registration No. 11339

Mr. Henrik Voldbaek
Ash Grove Cement Co.
3801 E. Marginal Way S.
Seattle, Washington 98134

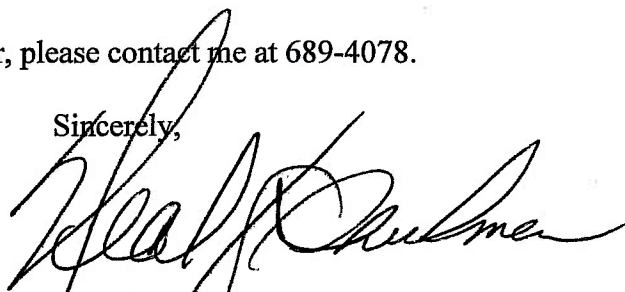
Dear Mr. Voldbaek:

Disposition of Notice of Violation No. 37060

Based on a November 2, 1998, review of this case and in light of the September 10, 1998, interim CEM civil penalty policy which has not been Board approved and which is subject to change, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,



Neal J. Shulman
Manager Inspection

EMG:VJD

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Margaret Pageler, City of Seattle, Board Chair
Janet Chalupnik, Member at Large
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton
Dave Somers, Snohomish County Council
Ron Sims, King County Executive

Brian Ebersole, Mayor, Tacoma
Charlotte Garrido, Commissioner, Kitsap County
Doug Sutherland, Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339
ert. Mail No. 2 384 353605

No. **37061**

NOTICE OF VIOLATION

Date of Violation: May 19, 1997 at _____ m.

Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldback Manager</u>		
Location of Violation (Address) <u>3801 E Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>As Above</u>	City, State <u>Seattle, WA.</u>	Zip <u>98134</u>	Phone <u>623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☒ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 6A
- ☐ Section During normal kiln operations CO emissions from the main stack shall not exceed 1049 ppm corrected to 10% O₂ 8 hr. Average
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION May CEM report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: [Signature]
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

Date/Time 5/19/97

Received By: _____
Signing this Notice is not an admission of guilt

AGCS2M000462

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

Art. Mail No. 2334353365

OCT 20 1997 35796

NOTICE OF VIOLATION

AGCW-SEATTLE

Date of Violation: August 18, 19 97 at _____ m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Henrik Voldback Manager</u>	
Location of Violation (Address) <u>3801 E. Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>As Above</u>	City, State <u>Seattle, WA</u>	Zip <u>98134</u>	Phone <u>623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☒ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. _____, Condition No. _____
- ☒ Section 12.02 (c) unlawful to cause or allow the operation of any equipment which is required to use CEM through an order of approval without the continuous
- ☐ Section monitoring of emissions per Reg I Sect 12.03 & 12.04

FACTS ALLEGED TO CONSTITUTE A VIOLATION Operation of the cement kiln while failing to continuously monitor SO₂, NO_x & CO emissions as required per order of approval 5730 Condition # 8 dated 12/29/94

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: M. [Signature]

Air Pollution Inspector

Form No. 70-119 (Revised 12/95 cbe)

Date/Time 10/17/97

Received By: _____

Signing this Notice is not an admission of guilt

AGCS2M000463